

JUN 10 2015

SOUTHERNDISTRICT OFTEXAS

David J. Bradley, Clerk

MCALLEN DIVISION

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

**Ramon Lopez-Bucio**

A206 426 771

*Principal*

YOB: 1976

Mexico

Case Number:

M-15- 0943 -M

**Timoteo Delgado-Soto**

A091 188 176

*Co-Principal*

YOB: 1968

Mexico

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about June 8, 2015 in Hidalgo County, in the Southern District of Texas defendants(s) did, *(Type Statutory Language of Offense)*

**knowing or in reckless disregard of the fact that Inmar Alexander Ortega-Bran, citizen of El Salvador, and Israel Nava-Mireles, citizen of Mexico, along with seventy-four (74) other undocumented aliens, for a total of seventy-six (76), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempt to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation,**

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii)  
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

**On June 9, 2015, FIT agents received information regarding a suspected stash house located near the intersection of Sugarbird Lane and Hunnybird Lane in Edinburg, TX. The information was received from a smuggled alien who was arrested following a bail out in Willacy County.**

## SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

 Yes  No

Signature of Complainant

Derek Conrow Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

June 10, 2015

McAllen, Texas

City and State

Peter E. Ormsby  
Name and Title of Judicial Officer

, U. S. Magistrate Judge

Signature of Judicial Officer

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS

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**CONTINUATION:**

The individual that agents received the information from identified two trailers at the intersection of Sugarbird Lane and Hunnybird Lane in Edinburg, Texas. The subject told agents he was held in the rear trailer at that location before being moved north. Additionally, the subject told agents there were approximately 100 other illegal aliens inside the trailer when he left.

FIT agents H. Garcia and J. Alvarado set up surveillance on the trailer. At approximately 3:15 p.m., they observed a tan Chevrolet Tahoe arrive and depart shortly after. FIT Agents requested assistance from the Hidalgo County Constables Office in conducting a vehicle stop on the Tahoe. The constable stopped the Tahoe for Changing Lanes When Unsafe.

Agents arrived and interviewed the occupants of the Tahoe. The driver, identified as Ramon LOPEZ-Bucio, was an illegal alien. The passenger, identified as Timoteo DELGADO-Soto, also claimed to be illegally in the United States.

Both Ramon LOPEZ-Bucio and Timoteo DELGADO-Soto were read their Miranda rights at the scene and waived their rights to a lawyer prior to speaking to agents.

LOPEZ told agents he had just picked up water for the illegal aliens staying in the trailer at Sugarbird and Hunnybird Lane. According to LOPEZ, he was working for a man he knew as Tacho who paid him \$20 (USD) to make sure the smuggled aliens had water.

DELGADO denied any involvement in alien smuggling.

Neither LOPEZ nor DELGADO were willing to grant consent to enter the trailers where the illegal aliens were being harbored, because they said they were not in charge of the trailers.

At approximately 5:45 p.m. FIT agents and Hidalgo County Constables approached the two trailers in an attempt to obtain consent to search for undocumented aliens. As agents were approaching the rear trailer where the informant said he stayed, approximately seven subjects attempted to abscond. Some were apprehended and some were able to abscond. All of the people apprehended were illegal aliens.

While agents were trying to round up the people who were attempting to abscond, it became very chaotic inside the trailer, because the occupants were running back and forth from window to window, looking for an opportunity to flee.

**UNITED STATES DISTRICT COURT**  
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FIT Agent J. Alvarado, who was standing outside and below the front door of the trailer, (the trailer was elevated) was speaking to Israel Nava-Mireles who was inside the trailer. Nava told Agent Alvarado he had been staying at the trailer for 9 days, and it was so crowded in the trailer, it was very difficult to move around. While speaking to Nava, another person who was inside the trailer, shoved an unidentified female out of the door and on to Agent Alvarado. Simultaneously, others began pushing their way out the door and windows. Approximately 15 additional subjects jumped out of any available window or door and attempted to abscond.

Agents entered the trailer due to the escalating threat of injury to both the agents and the illegal aliens who were still inside the trailer. Agents apprehended a total of 75 illegal aliens in and around the first trailer they approached. Approximately 20 suspected illegal aliens were able to successfully abscond.

**CONDITION OF THE TRAILER:**

The trailer was approximately 600-700 square feet and had no furniture. There was no electricity, and it was very hot inside the trailer. There was no running water in the restroom, and some of the smuggled aliens told agents they have refrained from defecating for up to five days due to the non-working state of the restroom. The smell of the restroom and trash throughout the house was overwhelming.

In the front trailer, agents found one illegal alien, and an air soft pistol, but they were not able to tie the subject into the alien smuggling activities, and he was not charged.

**PRINCIPAL'S STATEMENT:**

Both principals were read their rights on scene, and once at the station were approached about providing a written statement. LOPEZ stated he was willing to provide a statement, but DELGADO did not want to speak to agents any further.

LOPEZ told agents he was on his way back to the trailer to deliver water to the illegal aliens staying there. According to LOPEZ he has been to the trailer several times before, and was paid \$20 (USD) to take water to the people staying there. He admitted he knew the people staying there were illegal. In addition to taking water to the people, he was paid \$100 (USD) per person he transported north. LOPEZ stated he has made approximately 7 trips north with approximately 5 illegal aliens in each trip. LOPEZ would drop off the illegal aliens on the south side of the Highway 77 checkpoint and let them walk around. A man named Tacho was in charge of paying him.

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**ADDITIONAL ORAL STATEMENTS MADE BY LOPEZ:**

After providing his sworn statement, LOPEZ agreed to accompany agents on a custodial interview to provide them additional information regarding other smuggling details. During that interview, LOPEZ told agents that Timoteo DELGADO-Soto, who is the co-defendant in this case, was actually the driver of the bailout that occurred in Willacy County which was referenced earlier in this complaint. LOPEZ claims to have knowledge of this, because he was driving the scout vehicle for that same load.

No statements were made under oath by Timoteo DELGADO-Soto, however he has been convicted of alien smuggling on two prior occasions; once locally in 2014 and once by the federal government in 2012.

**MATERIAL WITNESSES' STATEMENTS:**

Both material witnesses were read their rights. Both stated they were willing to provide statements without the presence of an attorney.

1- Inmar Alexander Ortega-Bran, a citizen of El Salvador, stated he was charged \$7,000 (USD) to be smuggled to Houston, Texas. After illegally crossing the Rio Grande River, he was transported to a couple of houses and then to a mall in McAllen. At the mall, he was picked up by a man driving a brown vehicle; the same man that was arrested today driving the Tahoe. Ortega identified LOPEZ in a photo lineup as the man who picked him up from the mall and transported him the house where he was arrested. Ortega also told agents he saw LOPEZ at least three other times transporting people to the trailer. Ortega also saw LOPEZ bring water several times to the trailer for the people to drink. According to Ortega, he has been at the trailer for approximately 5 days, and during that time, there has been at least 70 people inside the trailer at all times. Also, he stated there was enough water to drink, but they very rarely had any food.

Ortega also told agents that on this occasion, another man showed up with LOPEZ and dropped off a few people at the trailer. They then took the empty water jugs and left. Ortega identified DELGADO in a photo lineup as the extra man who was accompanying LOPEZ.

2- Israel Nava-Mireles, a citizen of Mexico, stated he was charged \$3,600 (USD) to be smuggled into the United States. After illegally crossing the Rio Grande River, the group he was with was chased by Border Patrol. Most of the group was caught, but he and another escaped and called the smuggler to come pick them up. Later, a man arrived and transported them to the house where he was arrested. He was at that trailer for 9 days before being arrested. According to Nava, there were two people in charge of the trailer, who he knew as Joe and Chilango, but neither of them were apprehended. Nava told agents there were two other men who transported people to and from the trailer and also brought water to the people staying there. Nava identified both LOPEZ and DELGADO in separate photo lineups as the two men who would arrive and give orders to Joe and Chilango. Nava stated LOPEZ and DELGADO would arrive and tell Joe and Chilango to offload water, or they would give them a list of people who would be leaving the house, and order them to get them ready to leave.